

REMARKS

The Office Action mailed November 15, 2006 considered claims 1-32. Claims 1 and 15 were rejected under 35 U.S.C 101 because the claimed invention is not directed to statutory subject matter. Claims 1-32 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lucas et al. (U.S. Patent No. 6,834,264), hereinafter *Lucas* and further in view of Dragosh et al. (U.S. Patent No. 6,078,886), hereinafter *Dragosh*.¹

By this amendment claims 1, 2, 4-6, 11, 15, 20, 30, and 31 have been amended.² Claims 8-10, 12, 19 have been cancelled. Accordingly, claim 1-7, 11, 13-18, and 20-32 are pending, of which claims 1, 14, 15, and 30 are the independent claims at issue.

As defined in independent claim 1, Applicants' inventive method is directed to recognizing natural human input. Claim 1 defines detecting, at a system component, natural input data directed to an input field from a plurality of input fields of an executing program, wherein the natural input data comprises an input other than textual input, the natural input data entered into the computing device by a user of the computing device. Next, claim 1 defines calling a field signature engine to obtain a field signature for the input field. Next, claim 1 defines receiving a field signature for the input field from the field signature engine. The field signature represents the context of the input field and is constructed from an analysis of the attributes of the input field.

Next, claim 1 defines using the field signature as a key to query a field mapping database for a factoid for the represented context. Next, claim 1 defines receiving a factoid from the file mapping database. The factoid contains contextual rules to more accurately recognize that natural input data. Next, claim 1 defines using the factoid as a key to query a user bias database for user bias data. Next, claim 1 defines receiving using bias data that can be used to further bias the recognition of the natural input data, within the represented context, to more accurately recognize that natural data input;

Next, claim 1 defines submitting the natural input data, the factoid, and the user bias data to a recognition engine so that the recognition engine can use the contextual rules contained in

¹ Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

² Support for the amendments to the claims are found throughout the specification and previously presented claims, including but not limited to paragraphs [0039], [0040], [0046], [0048], [0050], and [0055]-[0066] and Figures 2, 6, 7, and 8.

the factoid and the user bias data to perform context-based recognition of the natural data input. Lastly, claim 1 defines receiving a recognition result of the natural input data from the recognition engine for inclusion in the input field, the recognition result biased by the user-specific biasing information within the represented context.

Claim 14 is a computer-readable media claim corresponding to claim 1. Claims 15 and 30 are systems claims similar to claim 1.

Applicant respectfully submits that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

Lucas describes a method and apparatus for voice dictation and document production. To fill-in a field a user may dictate speech into an audio input. (Col. 3, ll. 15-16). The processing and storage system may automatically generate an audio file, along with an associated transcribed dictation file, and an indexing file. (Col. 3, ll. 18-21). Such generation may be accomplished with a voice recognition engine. (Col. 3, 21-22). As selectable by user ID, voice profiles, voice models, user specific vocabularies, and specialty specific vocabularies can be used to effect a transcription. (Col. 3, ll. 55-62, Col. 10, ll. 36-60, Col. 16., ll. 31-34, Figure 3B, and Figure 6).

Dragosh describes a system and method for providing remote automatic speech recognition services via a packet network. *Dragosh* includes embodiments where a client can request a grammar from a server (Figures 2, 3, and 4) and where streaming audio at a client is recognized as speech at a server (Figures 5, 6, and 7). A form filling service can complete a form in response to spoken response to requests for information. (Col. 9, ll. 17-20). A client can send grammar rules representing possible choices for each blank to a server. (Col. 9, ll. 21-24). For each blank, the client can request activation of the appropriate grammar rule and sends a corresponding answer made in response to a request for information needed to complete a blank. (Col. 9, ll. 24-27). The server then applies the grammar and rule and returns text to be inserted in the form. (Col. 9, ll. 27-30).

Thus, *Dragosh* describes that when a blank has pre-defined possible choices, the possible choices can be self-contained in a grammar to assist in recognition of the pre-defined possible choices. When entering data in a particular blank, the client can instruct the server to utilize the part of the grammar applicable to the particular blank. Since the client is already

aware of the grammar (the client sent the grammar) and the choices are self-contained, there is no need inquire as to the possible choices.

Accordingly, *Lucas and Dragosh* fail to teach either singly or in combination:

“an act of using a field signature as a key to query a field mapping database for a factoid for a represented context;

an act of receiving a factoid from field mapping database, the factoid containing contextual rules to more accurately recognize that natural input data;

an act of using the factoid as a key to query a user bias database for user bias data; and

an act of receiving using bias data that can be used to further refine the recognition of the natural input data, within the represented context and in combination with the contextual rules, to more accurately recognize that natural data input;”

in combination with the other limitations of claim 1, as recited in claim 1. For at least this reason, claim 1 patentably defines over the art of record. For at least the same reason claims 14, 15, and 30 also patentably define over the art of record

Claims 1 and 15 were rejected under 35 U.S.C 101 because the claimed invention is not directed to statutory subject matter. More specifically, claims 1 and 15 are drawn to a “program” per se and as such are not statutory subject matter. Claim 1 has been amended to recite a “method” and “acts” being performed to realize the functionality of the method. Claim 15 has been amended to include various computer system components. Applicants submit that the amendments to claims 1 and 15 define structural and functional interrelationships between elements. Accordingly, Applicants respectfully request that 35 U.S.C 101 rejections be withdrawn.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the

future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 21st day of February, 2007.

Respectfully submitted,



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